

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NORTH DAKOTA

In re:)	Case No. 25-30002
)	(Chapter 11)
GENERATIONS ON 1ST, LLC)	
)	
Debtor)	
)	
)	
In re:)	Case No. 25-30003
)	(Chapter 11)
PARKSIDE PLACE, LLC)	
)	
Debtor)	
)	Jointly Administered

MOTION TO EXPEDITE FIFTH CASH COLLATERAL HEARING

Come now Generations on 1st, LLC (“Generations”) and Parkside Place, LLC (“Parkside”) (collectively, the “Debtors,” and each a “Debtor”), by and through undersigned proposed counsel, pursuant to Local Rule 9006-1, and move this Honorable Court to hold an expedited hearing, in consideration of the Debtors’ Fifth Motion for Leave to Use Cash Collateral (the “Fifth Cash Collateral Motion,” as found at DE #245), and in support thereof state as follows:

As set forth in the Fifth Cash Collateral Motion, the terms underlying the Debtors’ use of cash collateral are presently set to expire on December 15, 2025. The Debtors operate eponymous apartment buildings in Watertown, South Dakota and require the use of rental proceeds to manage the properties—both for the benefit of the maintenance of the assets themselves and, too, for the benefit of the myriad tenants occupying the two buildings. RRSB appears to have a lien on those rents (albeit one that is contested) and, accordingly, approval of any forward-looking use of cash collateral is critical to the preservation of these two estates and the reorganizational ambitions of both Debtors.

The Local Rules of this Honorable Court permit expedited hearings. Local Rule 9006-1.

Consistent with those rules, the Debtors submit as follows:

- a. The grounds of the Fifth Cash Collateral Motion are set forth therein (albeit incorporating, by reference, the grounds set forth in the original cash collateral motion);
- b. The Debtors do not propose a specific hearing date and, rather, note that a cash collateral payment is already due on December 15, 2025 pursuant to an existing stipulation, meaning any future monthly payments would not come due until January 15, 2026;
- c. The Debtors propose responses to the Fifth Cash Collateral Motion be due by 5:00 pm prevailing central time on the calendar day immediately preceding the hearing date set by this Honorable Court.

Respectfully Submitted,

Dated: December 11, 2025

By: /s/ Maurice B. VerStandig
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11th day of December, 2025, a copy of the foregoing was served electronically upon filing via the ECF system.

/s/ Maurice B. VerStandig
Maurice B. VerStandig